

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<i>In re</i>	:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	:	Case No. 22-11068 (JTD)
Debtors.	:	(Jointly Administered)
	:	
	:	<b>Hearing Date: November 20, 2024, at 2:00 p.m.</b>
	:	<b>(prevailing Eastern Time)</b>
	:	
	:	

**NOTICE OF REVISED PROPOSED ORDER  
(EXAMINER'S MOTION FOR ENTRY OF AN ORDER  
DISCHARGING THE EXAMINER AND GRANTING RELATED RELIEF)**

**PLEASE TAKE NOTICE** that on October 30, 2024, Robert J. Cleary, in his capacity as the examiner appointed in the above-captioned bankruptcy cases (the “Chapter 11 Cases”), filed and served the *Examiner’s Motion for Entry of an Order Discharging the Examiner and Granting Related Relief* [D.I. 27460] (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order (the “Original Proposed Order”) was attached to the Motion as Exhibit A thereto.

**PLEASE TAKE FURTHER NOTICE** that the Examiner received informal comments from counsel for the Office of the United States Trustee (the “OUST”) regarding the Original Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that the Examiner has included comments received from the OUST in a revised form of proposed order sought on the Motion (the “Revised Proposed Order”), a copy of which is attached hereto as **Exhibit A**. For the convenience of the Court and other interested parties, a blackline comparing the Revised Proposed Order against the Original Proposed Order is attached hereto as **Exhibit B**.

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**PLEASE TAKE FURTHER NOTICE** that counsel for each of the OUST, Debtors, and Official Committee of Unsecured Creditors have reviewed the form of Revised Proposed Order and have indicated no objection on behalf of their respective clients.

**PLEASE TAKE FURTHER NOTICE** that at the hearing currently scheduled for November 20, 2024, at 2:00 p.m. Eastern Time, the Examiner intends to request entry of the Revised Proposed Order.

Dated: November 19, 2024

Respectfully submitted,

**ASHBY & GEDDES, P.A.**

By: /s/ Michael D. DeBaecke

Michael D. DeBaecke (Bar No. 3186)  
500 Delaware Avenue, 8th Floor  
Wilmington, DE 19801  
Tel: (302) 654-1888  
Email: mdebaecke@ashbygeddes.com

-and-

**PATTERSON BELKNAP WEBB &  
TYLER LLP**

Daniel A. Lowenthal (admitted *pro hac vice*)  
Kimberly A. Black (admitted *pro hac vice*)  
1133 Avenue of the Americas  
New York, NY 10036-6710  
Telephone: (212) 336-2000  
Facsimile: (212) 336-2222  
Email: dalowenthal@pbwt.com  
Email: kblack@pbwt.com

*Counsel to Robert J. Cleary in his capacity  
as Examiner appointed in the Chapter 11  
Cases*